

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

DEMOCRACY NORTH CAROLINA, et
al.,

Plaintiffs,

CASE NO.
1:23CV00878-TDS-
JEP

vs.

ALAN HIRSCH, in his official
capacity as CHAIR OF THE STATE
BOARD OF ELECTIONS, et al.,

Defendants.

30 (b) (6) DEPOSITION OF
CUMBERLAND COUNTY BOARD OF ELECTIONS
BY ANGELA AMARO

(Taken by Plaintiffs)

Fayetteville, North Carolina

March 11, 2025

Reported by Andrea L. Kingsley, RPR

1 A P P E A R A N C E S
2

3 ON BEHALF OF THE PLAINTIFFS:

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24 ON BEHALF OF THE WITNESS:

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Hnelson@cumberlandcountync.gov26 ALSO PRESENT: Jamie Noonan Witte, Esquire,
27 Steptoe, LLP (via Zoom)

28 Tamika Henderson (via Zoom)

1 30 (b) (6) DEPOSITION OF CUMBERLAND
2 COUNTY BOARD OF ELECTIONS BY ANGELA AMARO, a
3 witness called on behalf of the Plaintiffs
4 pursuant to the Federal Rules of Civil
5 Procedure, before Andrea L. Kingsley, Notary
6 Public, in and for the State of North
7 Carolina, at Cumberland County Board of
8 Elections, 227 Fountainhead Lane,
9 Fayetteville, North Carolina, on Tuesday,
10 March 11, 2025, commencing at 10:02 a.m.

1 seen in past years failed mail verification to the
2 best of your memory?

3 A. They fail mail verification for first
4 time voter often regardless of same-day
5 registration or just a registered voter.

6 Q. So that includes people who register
7 before that 25 day deadline?

8 A. Yes, ma'am.

9 Q. Do you have any thoughts as to why
10 that -- why people fail mail verification often?

11 A. No.

12 Q. Would it surprise you if people at Fort
13 Liberty failed mail verification often?

14 A. No.

15 Q. Why not?

16 A. They register with their barracks
17 address and we have to convert it to a physical
18 address. And we don't have a contact at Fort Bragg
19 to know how these mail-in addresses are supposed to
20 go in.

21 Q. How do you do that conversion process of
22 their barracks to their mailing address?

23 A. If they register like C4930, they go
24 into -- I don't do this, I've done it in the past,
25 they go into a GIS system and put in that C4930 and

1 it populates with the barrack number and a street.

2 Q. You said you don't have a contact at
3 Fort Bragg. Have you ever had a contact there in
4 the past?

5 A. That you would have to ask Vicki. She
6 deals more with Fort Bragg than I do.

7 Q. So the GIS is just something that is
8 created outside of your office, that's just
9 something you use when you're doing this conversion?

10 A. Correct.

11 Q. Are there any other kinds of addresses
12 you have to do that for?

13 A. No.

14 Q. What about with college campuses?

15 A. We know how to input those into the
16 system.

17 Q. What do you use to input those?

18 A. The physical address of the campus.

19 Q. How do you get that physical address?

20 A. How do I say this -- Fayetteville State
21 is just 1200 Murchison Road and Methodist
22 University is 5400 Ramsey Street that's the
23 physical address of the campus.

24 Q. Have you had any contact with maybe
25 administrators at those campuses about mailing

1 addresses?

2 A. No.

3 Q. Do you know if those addresses are
4 common knowledge to maybe the student voters who
5 come to register?

6 A. Yes.

7 Q. Do you train poll workers on working
8 with student voters on those addresses?

9 A. Yes.

10 Q. What do the poll workers -- do they get
11 any physical information about that?

12 A. Clarify?

13 Q. Do you have those addresses for students
14 written down and provided to the poll workers at
15 early voting?

16 A. No.

17 Q. Is that given in the training that we
18 talked about earlier?

19 A. Not the addresses.

20 Q. So how are the early voting poll workers
21 trained to give these addresses or work with
22 students on these addresses?

23 A. They are our long term officials and
24 they have worked with these colleges enough to know
25 the addresses and know that they must get a PO box

1 or mailing address.

2 Q. Do you know if it happens often, that
3 that doesn't happen, they don't get the PO box or
4 mailing box?

5 A. No.

6 Q. Going back to Fort Bragg, do the
7 election officials at early voting get any training
8 about those addresses?

9 A. No. If they have a Fort Bragg, they
10 contact us immediately so we can convert it to a
11 street so it will go into the system.

12 Q. That happens at the time someone is
13 registering?

14 A. Correct.

15 Q. Do you ever have to correct any of that
16 after the fact, after that registration form is sent
17 to your office?

18 A. No.

19 Q. Fort Bragg, Fort Liberty, they are the
20 same place; right?

21 A. Yes.

22 Q. Have you had any issues reconciling as
23 those addresses have changed?

24 A. No.

25 Q. So it went from Fort Bragg to Fort

1 you talked about to do that conversion?

2 A. Yes.

3 Q. Do you try to get any extra contact
4 information for folks at Fort Bragg or Fort Liberty
5 in case there are issues with their address?

6 A. No.

7 Q. Do you recommend that they provide a
8 phone number or email?

9 A. That is optional to the voter.

10 Q. But you don't recommend one way or the
11 other whether they include it?

12 A. No.

13 Q. I would like to go back to this big long
14 document. You have it open in front of you.

15 On page 2 of that, I think yours is
16 single-sided, you see maybe about a third of the way
17 down there's a column that goes right down the
18 middle with addresses in it and about a third of the
19 down do you see the 4335 Wollaton Park, Fort Liberty
20 address?

21 A. Yes.

22 Q. Is that one of the addresses that you
23 all use for mailing to Fort Liberty?

24 A. Yes.

25 Q. How do you determine that that is a

1 mailing address for Fort Liberty?

2 A. Through the GIS system.

3 Q. Is that something that the voters
4 provide, that Wollaton Park address?

5 A. No.

6 Q. Do the poll workers who have the voter
7 there after they contact you, do they confirm with
8 the voters that that Wollaton Park address is
9 correct?

10 A. No.

11 Q. Is there any reason that they don't
12 confirm that with the voters?

13 A. The soldiers don't know the physical
14 addresses, they only know their barracks.

15 Q. If you look further down that column
16 there's also a Lane Street address. How do you know
17 whether someone is -- should be assigned to Wollaton
18 Park versus Lane Street?

19 A. Based on their C Company, D Company, B
20 Company.

21 Q. How do you know which company?

22 A. They provide that, the voter provides
23 that information.

24 Q. Did you do any testing or mailers to
25 confirm that the GIS street addresses actually can

1 receive mail?

2 A. No.

3 Q. Why not?

4 A. This is information that is provided to
5 our office from the county planning streets, of
6 that nature.

7 Q. Do you know whether the county confirms
8 that these are addresses that can receive mail?

9 A. I'm not able to speak on that.

10 Q. If you keep looking down the same
11 column, there's a few other streets, it looks like
12 Goldberg, Readiness, Red Devil Street, there's
13 another Wollaton Park. So those are all addresses
14 that you use versus the voter providing when they
15 come to register?

16 A. Correct.

17 Q. Does it surprise you that these
18 addresses return as undeliverable?

19 A. No.

20 Q. Why not?

21 A. The office gets lots of return mailings
22 from Fort Bragg and all across the county daily.

23 Q. Do you have a sense whether this --
24 we'll use the Wollaton Park for example, it looks
25 like that was provided for some other folks on the

1 A. When a voter registers, again, I will go
2 back to C Company, 4925, our early voting officials
3 know that that address is not going to go in our
4 system. So they contact us at the Board of
5 Elections to convert it to an actual street, house
6 number with a street name. We then take that C
7 4925, convert it to an actual street name, and then
8 if the voter does not provide us with a mailing
9 address we will put in the mailing address that C
10 4925.

11 Q. Okay. Is it often that a voter does not
12 provide either the mailing address or that C
13 whatever address --

14 A. There are times that that does happen.

15 Q. Do you have a sense of whether those
16 voter registration cards often return as
17 undeliverable?

18 A. I do not handle that part of the process
19 with the cards being returned.

20 Q. I think I said this at the top but just
21 for the record, this was a document that was
22 produced by the State Board of Elections and it was
23 sorted for Cumberland County, that's the column you
24 see has all the 26s, that is the county ID that you
25 can find online on the State Board's website.